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November 29, 2011

Mr. Kan-Wai Tong, PE  
Utilities Safety Section  
Safety and Reliability Branch  
California Public Utilities Commission  
320 W. Fourth Street, Suite 500  
Los Angeles, CA 90013

Dear Mr. Tong,

On behalf of the Utilities Safety and Reliability Branch of the California Public Utilities Commission (CPUC), you conducted a GO 112-E inspection of Southern California Gas Company's Inland Region Distribution gas facilities on October 3-7 and October 10-14, 2011. The audit included a review of records for the period of April 2010 to October 2011, and various field inspections in the San Bernardino, Chino, Rim Forest, and Fontana districts.

In addition, you reviewed operator qualification records and performed field observations of randomly selected individuals performing their prescribed covered tasks.

During the audit you identified a violation of GO 112-E, Reference Title 49 Code of Federal Regulations (49 CFR), Part 192, Section 605 Procedural manual for operations, maintenance, and emergencies.

### **Finding**

**G.O. 112-E Reference Title 49 Code of Federal Regulations (49CFR), Part 192, Section 192.605(a) states:**

*"General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency responses..."*

When you observed operation of a gate valve (V5 at pressure limiting station numbered 1322) in Fontana district, you stated that our employee deviated from company procedures and treated it as a plug valve. As a result, you stated that SoCalGas was in violation of the above rule by



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failing to follow its' written procedures for conducting this operations and maintenance activity.

## **Response**

Our investigation determined that during this activity, the employee failed to review all available data for the involved valve. As a result, he assumed the valve was a plug valve and exercised using plug valve criteria. Had all data been reviewed, the employee would have known that facility was a gate valve, requiring a different exercise procedure.

## **Corrective Action**

Company Gas Standard 184.16 – “Valve Inspection and Maintenance – Distribution” was reviewed with the involved employee. He has performed this task in the past with no issues and understands that it is his responsibility to verify the type of valve being inspected and its proper operation. It appears this was an isolated incident with this employee and that he is qualified to perform this task.

The gas procedure was also reviewed with all the Inland M&R field employees and confirmed that they also understand the Company Gas Standard. All Inland Region M&R employees understand the importance of properly performing valve inspections to ensure the safety and integrity of the system.

Please contact Jeff Koskie at (213) 305-8660 if you have any questions or need additional information.

Sincerely,




Barry Kerns

Attachment

Cc: Mr. Raffy Stepanian, CPUC-Los Angeles  
Mr. Michael Robertson, CPUC-Los Angeles



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Bcc: Williams, Cedric  
Koskie, Jeff  
Bauer, Troy  
Marrero, Zandra  
Soto, Gil  
Osburn, Mike  
Serrano, Mark  
Cho, Jimmie  
Lane, Bret